

DECLARATION OF VICKI J. AZNARAN

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3 I, Vicki J. Aznaran, make the following declarations on
4 personal knowledge except where the context indicates knowledge
5 based upon information and belief.

6 1. My husband Richard Aznaran and I are plaintiffs in the
7 instant action wherein defendants (hereinafter referred to col-
8 lectively as "Scientology") have moved to strike our entire
9 complaint and to prevent our attorneys from representing us.

10 2. As set forth in more detail below, my husband and I were
11 involved with Scientology for approximately 15 years. For much of
12 that time we were members of an organization known as the Sea
13 Organization. This organization is an elite organization within
14 Scientology. The Sea Organization has considerable influence and
15 control over Scientology organizations. Generally, Sea Organiza-
16 tion members hold the management posts within Scientology.

17 3. In 1978, after approximately four years as staff
18 members, my husband and I joined the Sea Organization. From 1978
19 to early 1987, my husband and I worked most of our waking hours,
20 with very few days off, at our various assignments within
21 Scientology. I eventually became President of Religious
22 Technology Center and, supposedly, the top "ecclesiastical"
23 authority within Scientology. Richard was a high-level security
24 officer. During this period my husband and I became intimately
25 familiar with the structure and activities of various Scientology
26 organizations. Among other things, I was briefed on and sometimes
27 a participant in meetings involving litigation tactics and various
28 means used to attack and fight "enemies" of Scientology. In

1 numerous instances I was in the chain of command or approval for
2 such activities. The legal strategy of Scientology and the
3 existence of numerous potential legal problems, some of which are
4 set forth below, were known to me when I was a staff member in
5 Scientology. Contrary to what I understand to be claimed by
6 defendants herein, Mr. Yanny did not reveal to me the legal
7 strategies or secrets of Scientology. Nor did Mr. Yanny invent or
8 open my eyes to the wrongs that I had suffered at the hands of
9 Scientology.

10 4. I have become an "enemy" of Scientology. This has
11 certain consequences that will influence what Scientology will do
12 in this litigation. For example, it is important to understand
13 that their value system allows dishonesty if done in the name of
14 Scientology.

15 5. Enemies of Scientology are deemed to be "suppressive
16 persons" ("SPs"). One becomes a "suppressive person" by doing a
17 suppressive act, such as suing Scientology as a litigant or
18 lawyer. In the jargon of Scientology, when one is "declared" this
19 means that one has been declared a "suppressive person" and,
20 therefore, may be harassed, hurt, damaged or destroyed without
21 regard to truth, honesty or legal rights. It is considered
22 acceptable within Scientology to lie, cheat, steal and commit
23 illegal acts in the name of dealing with a "suppressive person".

24 6. This practice or policy is sometimes referred to as the
25 policy of "fair game". In the jargon of Scientology, a person who
26 is "declared" is understood to be a suppressive person. This
27 means that the person is "fair game". The fair game policy was
28 issued in the 1960s. It was never cancelled. A document was

1 issued for public relations reasons that purportedly cancelled
2 "fair game"; however, that document stated that it did not change
3 the manner of handling persons declared "SP." In reality, the
4 purported cancellation of fair game is at most a matter of
5 semantics. Enemies of Scientology are treated as "fair game."

6 7. It is my understanding, and I have so testified in my
7 deposition, that when my husband and I escaped from Scientology we
8 were not immediately declared suppressive persons or subjected to
9 the fair game policy. Among other things, we were compelled to do
10 certain things and sign various documents to escape and avoid
11 being subjected to fair game treatment. As we have now sued
12 Scientology, we are "fair game".

13 8. From 1984 through early 1987, I was President of
14 Religious Technology Center (hereinafter "RTC"). As President of
15 RTC and a Sea Organization member, I attended many meetings
16 concerning the numerous legal actions involving Scientology
17 organizations. During this time period, I had personal access to
18 all legal documents having to do with RTC. I received a report
19 every day on my computer that included a synopsis of each ongoing
20 legal case involving Scientology. I received, or so I was told,
21 copies of every major motion filed in cases involving Scientology.
22 I was on the "approval lines" for legal documents dealing with
23 RTC. During this time period, I had the option of attending legal
24 meetings although some were mandatory. I attended many litigation
25 meetings and became generally aware of Scientology's dirty tricks
26 and legal maneuvers. On specifics, I frequently deferred to
27 in-house and outside counsel, however, at least in theory, I was
28 the head of RTC and had access to any business or litigation

1 "secrets" of Scientology.

2 9. As President of RTC, I was one of those responsible for
3 retaining the services of Joseph Yanny as counsel for Scientology
4 organizations. I supervised and worked with Mr. Yanny who served
5 as coordinating attorney for RTC in 1985. I am not aware of any
6 legal or corporate information concerning RTC that was available
7 to Mr. Yanny but not available to me.

8 10. I am informed and believe that various Scientology
9 organizations are contending that Mr. Yanny has somehow improperly
10 educated me on the legal maneuvers, tactics and affairs of
11 Scientology. Although such claims are consistent with litigation
12 tactics of Scientology, which are not constrained by considera-
13 tions such as truth and reality, the proposition that I need
14 Mr. Yanny to educate me on the internal affairs of Scientology is
15 simply wrong. I was one of the highest ranking members of
16 Scientology and was involved in upper management. Mr. Yanny was a
17 lawyer hired by management, of which I was a part, to work for it.
18 Further, it was the practice during the time period in question to
19 screen the information given to outside counsel such as Mr Yanny.

20 11. It is the stated policy and practice of Scientology to
21 use the legal system to abuse and harass its enemies. This crude,
22 fundamental directive of Scientology is no secret. In any event,
23 this information did not come to me from Mr. Yanny. The policy is
24 to do anything and everything possible to harass the opposing
25 litigant without regard to whether any particular motion or
26 maneuver is appropriate or warranted by the facts or applicable
27 law. That policy was followed in every legal case I was involved
28 with or learned about while a member of the Sea Organization. The

1 management of Scientology consistently expressed and demonstrated
2 a complete disdain for the court system viewing it as nothing more
3 than a method to harass enemies. Some examples of this are set
4 forth below.

5 12. During litigation between Gerald Armstrong and
6 Scientology, which was before Judge Breckenridge of Superior Court
7 for Los Angeles County, the court ordered the production of
8 Armstrong's pre-clear ("PC") folders. These are files maintained
9 by Scientology on those who submit to interrogation sessions in a
10 process called auditing. During the course of that litigation I
11 was ordered to go through Armstrong's folders and destroy or
12 conceal anything that might be damaging to Scientology or helpful
13 to Armstrong's case. As ordered, I went through the files and
14 destroyed contents that might support Armstrong's claims against
15 Scientology. This practice is known within Scientology as
16 "culling PC folders" and is a common litigation tactic employed by
17 Scientology.

18 13. During other litigation in Los Angeles known to me as
19 the Wollersheim case, I was told that the judge had ordered the
20 production of Wollersheim's folders. As ordered, I "culled" these
21 files. In other words, I removed contents that might have been
22 damaging to Scientology or support Wollersheim's claims against
23 Scientology. For example, I removed evidence of events involving
24 his family, the anguish this caused him, evidence of disconnection
25 from family and evidence of fair game.

26 14. I was involved in numerous meetings concerning what is
27 known to me as the Christofferson case in Portland, Oregon. This
28 case was tried twice. In the first case, a Scientology witness by

1 the name of Martin Samuels was coached and drilled for hours on
2 how to lie convincingly or avoid telling the truth. Before or
3 during the second trial he admitted to this course of conduct. In
4 this litigation, a Scientologist by the name of Joan Shriver
5 produced responsive documents that may have been incriminating.
6 This was a serious breach of policy for which she was punished.
7 These documents were ordered produced on such short notice that
8 apparently files were not thoroughly "culled". In another case,
9 Mr. Yanny was severely criticized and almost fired for failing to
10 properly coach and feed the desired answers to Heber Jentzsch.
11 Mr. Jentzsch was, for public relations reasons, the purported head
12 of the Church of Scientology International. During his deposi-
13 tion, Mr. Jentzsch was unable to answer fundamental questions
14 concerning the management of Church of Scientology International.
15 This may be what certain defendants are referring to when they say
16 that they were dissatisfied with Mr. Yanny's services and I
17 protected him. There were those, including McShane, who were
18 outraged by the embarrassing testimony of Mr. Jentzsch. This was
19 blamed on Mr. Yanny. I did not wish to discontinue using
20 Mr. Yanny at RTC for this perceived problem.

21 15. In November, 1985, I was present at a meeting whereat
22 Earle Cooley, a Scientologist lawyer, Lyman Spurlock and Norman
23 Starkey, all high ranking Scientologists, announced that they were
24 going to contact Judge Mariana Pfaelzer. Earlier that day Judge
25 Pfaelzer had denied a Scientology motion for a temporary
26 restraining order. After losing on the application there was a
27 meeting to determine what to do about the situation. At the
28 meeting Mr. Cooley had a file that purportedly contained

1 background and personal information on Judge Pfaelzer. During the
2 meeting Mr. Cooley and the others announced that they were going
3 to attempt to meet with Judge Pfaelzer that evening, at her house
4 if necessary, concerning the litigation in which the temporary
5 restraining order had been sought. Thereafter, Mr. Cooley and two
6 others left with their file on Judge Pfaelzer. They returned
7 several hours later at which time I was told that their attempts
8 to contact Judge Pfaelzer had been unsuccessful.

9 16. In late 1979 and early 1980, there was a massive docu-
10 ment destruction program undertaken to destroy any evidence
11 showing that L. Ron Hubbard ("LRH") controlled Scientology. I
12 participated in this activity in Clearwater, Florida and am
13 informed that there was also intensive document destruction at
14 facilities in Gilman Hot Springs, California. From at least that
15 point onward there was a continuous effort to hide or destroy any
16 evidence of Hubbard's control. For example, during an IRS in-
17 vestigation in 1984 and 1985, while in bed with pneumonia, I was
18 ordered out of bed by Norman Starkey who told me that they had
19 received a tip from a Los Angeles Police officer advising them of
20 a pending IRS raid in Los Angeles. Mr. Starkey ordered me to go
21 to a computer facility and insure that all information on the
22 computers in Los Angeles that might show Hubbard's involvement and
23 control of Scientology's money was destroyed except for one copy
24 of each document. These copies were to be saved on computer discs
25 which were to be hidden in secure storage places. At the time I
26 was also instructed to destroy anything that would show the
27 control of Mr. Starkey or Mr. Miscavige over Scientology.

28 17. I have been informed and believe that a an improper

1 affidavit was filed in a case brought by L. Ron Hubbard, Jr. in
2 Riverside, California. The circumstances were as follows: The
3 document purported to be an affidavit of L. Ron Hubbard. The
4 signature of Hubbard was purportedly notarized by David Miscavige.
5 It is my understanding that this affidavit caused the case to be
6 dismissed. Subsequently, I was told by Pat Broeker, who had been
7 living with Hubbard at the time, and by Miscavige, that Miscavige
8 had not seen Hubbard between 1980 and Hubbard's death in 1986.
9 Accordingly, the affidavit was apparently signed, notarized and
10 dated during a time period when Hubbard was in seclusion and not
11 seen by the person who purportedly notarized the signature of
12 Hubbard.

13 18. In or about 1981, while working in a Scientology organi-
14 zation known as the Guardian's Office, I had access to and
15 observed various written and oral communications pertaining to
16 illegitimate activities participated in by the Guardian's Office.
17 The Guardian's Office attempted to infiltrate both governmental
18 and private agencies including the IRS, the Department of Justice,
19 the American Medical Association and the National Institute of
20 Mental Health. The purpose of this was to steal documents pur-
21 suant to Hubbard's "Snow White" program. The goal of this program
22 was to eliminate any negative reports about Hubbard and
23 Scientology that may have been held by these various agencies.

24 19. While involved in Scientology I became aware of various
25 operations directed against an author who had written a negative
26 book about Scientology. The author, Paulette Cooper, was sub-
27 jected to various forms of harassment. One operation included an
28 attempt to frame her. A false bomb threat was written. A

1 Scientology agent lifted a fingerprint from Cooper's apartment.
2 These fingerprints were then transferred to the bomb threat
3 letter. Ms. Cooper was subjected to an investigation and was not
4 cleared until an FBI raid resulted in the seizure of Scientology
5 documents that exposed the operation as a frame-up. There was at
6 least one other operation directed against Ms. Cooper. The
7 substance of it was to plant a boyfriend to reinforce and play
8 upon her suicidal tendencies in the hopes that she would commit
9 suicide.

10 20. In 1976 and 1977, the then Mayor of Clearwater, Florida,
11 Gabe Cazares was involved with litigation against Scientology.
12 Arrangements were made to have an attorney by the name of Merril
13 Vanniere, a Scientologist, represent Mr. Cazares and sabotage his
14 case. This plot was also exposed by documents obtained in an FBI
15 raid of a Scientology facility. Also, in response to Mr. Cazares'
16 litigation against Scientology, an attempt was made to implicate
17 Mr. Cazares in a staged hit-and-run accident.

18 21. During the time period of my involvement with
19 Scientology, I also learned of various attempts to influence
20 judges or force their removal from cases. For example, a private
21 investigator named Dick Bast obtained a statement from a prosti-
22 tute concerning involvement with a certain judge in Washington,
23 D.C. who was sitting on a Scientology case. This was then pub-
24 licized. The judge did not continue on the case. The same
25 investigator, Dick Bast was also hired for the purpose of at-
26 tempting to force the removal of a judge in Tampa, Florida. This
27 involved what I know as the Burden case, which was civil litiga-
28 tion brought by Michael Flynn. Dick Bast secured a yacht and

1 attempted to get the judge on board for the purpose of filming him
2 under compromising circumstances. The judge declined to go
3 yachting and the operation was unsuccessful. Approximately
4 \$250,000.00 was spent on the operation.

5 22. I have been informed by Mark (Marty) Rathbun, a high
6 ranking Scientologist, that his private investigator, Gene Ingram,
7 "fed" a confession to Ala Tamimi when visiting him in an Italian
8 prison. This false confession was, in substance, that Tamimi had
9 been involved in a bad check scam involving an account of L. Ron
10 Hubbard. This false confession implicated attorney Michael Flynn
11 in the check scam. Michael Flynn was at the time considered a
12 major enemy of Scientology because he represented numerous clients
13 with claims against Scientology. This purported confession was
14 used to slander and attack Michael Flynn. Michael Flynn has also
15 been sued by Scientology as part of its "strategy" for handling
16 enemies.

17 23. During an IRS criminal investigation in the 1984 to 1985
18 time period, the IRS ordered production of various communications
19 between Hubbard and Author Services, Inc. (ASI). The ASI staff
20 worked literally day and night for several days reviewing docu-
21 ments so that unfavorable documents could be destroyed or other-
22 wise concealed from the IRS. Lyman Spurlock and Marion M. Dendui,
23 Scientologists involved in this operation, informed me of this
24 operation. Also during this IRS investigation, my husband, Rick
25 Aznaran, was ordered to remove and conceal any incriminating
26 documents from certain locations. He was also directed to make
27 the computer network "raid proof". This involved creating a
28 system where incriminating documents could be deleted from

1 computer storage rapidly and before the IRS could obtain control
2 over the computers.

3 24. In 1985, I attended a conference on "squirrels" attended
4 by Miscavige, Starkey, Spurlock, and McShane, members of top
5 management, and others. In Scientology jargon, "squirrels" are
6 people who use or practice some procedures also used by
7 Scientology but who do not submit to the total control of the
8 Scientology organization and, perhaps most importantly, who do not
9 pay a percentage of their auditing or counseling fees to
10 Scientology. At this meeting, David Miscavige ordered that public
11 Scientologists be organized and motivated to physically attack
12 squirrels and disrupt their operations. This was stated to be
13 pursuant to the standard guidelines of Scientology. Pursuant to
14 such directives, efforts were undertaken to intimidate and disrupt
15 these persons and their organizations.

16 25. In 1981, operation "Juggernaut" was commenced. The
17 purpose of this was to destroy Michael Flynn who, as stated above,
18 was representing various plaintiffs with litigation against
19 Scientology. This operation contemplated the use of infiltration,
20 propaganda and attempts to persuade clients to turn against him.

21 26. The Guardians' Office got into so much trouble, and
22 worse yet got caught, that it was decided in the early 1980's that
23 the Guardians' Office should be disbanded. This was purely a
24 public relations gimmick. In short, it was decided that the
25 Guardians' Office and Mary Sue Hubbard, its then leader, were to
26 take the rap for all criticism and improper conduct. This scheme
27 was laid out in various written communications I observed in 1981
28 and 1982. (Of course, I was not allowed to keep or escape from

1 Scientology with any such incriminating documents.)

2 27. Since the early 1970's, Scientology has operated a
3 forced labor camp known as the Rehabilitation Project Force
4 ("RPF"). Staff members are incarcerated in the RPF for various
5 real or imagined offense. People confined at this camp are forced
6 to perform hard physical labor every day. They eat rice and
7 beans, or left-overs, and wear rags. They are deprived of suf-
8 ficient sleep. In 1987, I was confined in such a camp at Happy
9 Valley for approximately six weeks. I worked all day and was
10 confined in a room at night. To the best of my knowledge I was
11 guarded 24 hours a day. They would not even let me shower alone.
12 I had to obtain permission to use a bathroom. I was ill and not
13 allowed to obtain medical treatment. I was not allowed to com-
14 municate with my husband nor was I allowed to obtain adequate
15 sleep. I was told that I had gone insane and that my husband did
16 not want to communicate with me. I was physically and psycho-
17 logically abused both at Happy Valley and for numerous days
18 thereafter in a process called "security checking". Much over-
19 simplified, I was grilled on a primitive lie detector called an
20 E-Meter and made to understand that I would not be released, have
21 my property returned, or escape fair game policy unless I even-
22 tually gave all of the "right" answers. Examples of "right"
23 answers were responses that I would not talk to a lawyer or
24 consider suing Scientology. I had to give such answers before
25 being released.

26 28. Recovering from the years of brainwashing, thought
27 control and propaganda to which Scientology subjected me is a
28 gradual process that I do not fully understand. I am not a

1 psychologist or psychiatrist and do not fully understand the
2 ramifications of what I have been through although I can observe
3 and experience many symptoms. I have many nightmares and a fear
4 of Scientology.

5 29. The suit brought by Richard Aznaran and myself is based
6 upon real events that happened to real people, namely us. Just as
7 my husband and I do not need Mr. Yanny to educate us on any
8 secrets of Scientology, it is simply untrue that our claims were
9 somehow invented or manufactured by Mr. Yanny. The whimsical
10 notion that Mr. Yanny invented this litigation through my husband
11 and me is simply false.

12 30. My husband and I consider Mr. Yanny to be a friend.
13 Further, it might be noted that Mr. Yanny was to serve as my
14 personal counsel in a class action against Scientology and
15 numerous individuals including myself. Recent events have changed
16 this, however, there was a period of time when Mr. Yanny was
17 purportedly designated as my personal counsel with the approval of
18 Scientology.

19 31. My husband and I feel quite strongly that we want Barry
20 Van Sickle and the firm of Cummins & White to represent us in this
21 case. Our reasons are both subjective and objective. We do not
22 wish to list our subjective reasons, although we will do so if the
23 Court requests it. Objectively, it might be noted that we had
24 considerable difficulty finding counsel willing and in a position
25 to undertake this extremely volatile, time consuming and expensive
26 litigation. We are unable to pay hourly rates to pursue our
27 claims and need a firm willing to work with us on a contingency
28 fee basis. I anticipate great difficulty, delay and prejudice if

1 forced to find other counsel.

2 32. Based upon my experience within Scientology and as a
3 litigant against it, I understand that this is not routine liti-
4 gation. If I am forced to find other counsel, prospective counsel
5 will be presented with the following situation:

6 (a) A complex case that must be handled on a contin-
7 gency fee and cost-advanced basis;

8 (b) A case that requires a litigation team and sub-
9 stantial financial resources;

10 (c) A case involving an opponent who has a practice and
11 history of suing opposing lawyers as a tactic in addition to
12 subjecting opposing lawyers to surveillance, depositions, infil-
13 tration, bad publicity and the full ramifications of the fair game
14 policy;

15 (d) A case where the opponent is not constrained by a
16 need to be cost effective, truthful, honest or reasonable; and

17 (e) A case that requires extraordinary security
18 precautions.

19 I declare under penalty of perjury under the laws of the
20 State of California that the foregoing is true and correct.

21 Executed this 9 day of August, 1988, in Dallas, Texas.

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Vicki J. Aznaran
VICKI J. AZNARAN